

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN M. DEWEY, et al.,

Plaintiffs,

vs.

VOLKSWAGEN AG, et al.,

Defendants.

JACQUELINE DELGUERCIO, et al.,

Plaintiffs,

vs.

VOLKSWAGEN GROUP OF AMERICA, INC.,
et al.,

Defendants.

Case Nos.:

07-CV-2249-FSH-PS

07-CV-2361-FSH-PS

(consolidated)

**NOTICE OF JOINT MOTION
FOR PRELIMINARY
APPROVAL OF
SETTLEMENT,
CERTIFICATION OF
SETTLEMENT CLASS, AND
APPOINTMENT OF CO-CLASS
COUNSEL**

SIR/MADAM:

PLEASE TAKE NOTICE that on a date and time to be determined by the Court, the undersigned attorneys for plaintiffs and defendants shall move jointly before the United States District Court for an Order approving the settlement of the above captioned consolidated actions, certifying a Settlement Class, appointing Co-Class Counsel, and scheduling a Final Fairness Hearing.

PLEASE TAKE FURTHER NOTICE that the parties shall rely upon the Certification of Adam M. Slater, Certification of Samuel P. Sporn, Declaration of Daniel V. Gsovski, and the supporting brief filed and served herewith.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for DelGuercio Plaintiffs

By: /s/Adam M. Slater
ADAM M. SLATER

SCHOENGOLD & SPORN, PC
Attorneys for Dewey Plaintiffs

By: /s/Samuel P. Sporn
SAMUEL P. SPORN

HERZFELD & RUBIN, P.C.

By: /s/ Jeffrey L. Chase
JEFFREY L. CHASE

By: /s/ Daniel V. Gsovski
DANIEL V. GSOVSKI

Dated: January 29, 2010

CERTIFICATION OF SERVICE

I certify that on the date set forth below, I forwarded via ECF, the Notice of Motion for Preliminary Approval of Settlement, Certification of Settlement Class, and Appointment of Co-Class Counsel, Certification of Adam M. Slater, Certification of

Samuel P. Sporn, Declaration of Daniel V. Gsovski, supporting brief, and Certification of Service, to:

Honorable Patty Shwartz, U.S.M.J.
United States District Court
for the District of New Jersey
Martin Luther King, Jr. Federal
50 Walnut Street
Newark, New Jersey 07102

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

/s/Adam M. Slater
ADAM M. SLATER

Dated: January 29, 2010